# **EXHIBIT A**

### Case 6:20-cv-06100-EAW-MJP Document 108-3 Filed 12/22/22 Page 2 of 6 Charges Related to Confidentiality of Motion to Compel Exhibits

|                |            |                         |                      |                     | Hours        | Rate          | Total        |  |
|----------------|------------|-------------------------|----------------------|---------------------|--------------|---------------|--------------|--|
| Timekeeper     | Entry Date | Hours                   | <b>Cusomary Rate</b> | <b>Total Amount</b> | (Discounted) | (Discounted)  | (Discounted) | Work Description   |
| Sharon Stiller |            |                         |                      |                     |              |               |              | Review and revise confidentiality designation letter and privilege letter; |
|                |            |                         |                      |                     |              |               |              | conference with Maureen to go over edits to individual reply to motion     |
|                | 6/20/2022  | 1.9                     | \$425                | \$808               | 1.9          | \$400         | \$760        | response.  |
|                |            |                         |                      |                     |              |               |              | Conferences concerning remaining confidential information                  |
|                | 7/14/2022  | 0.3                     | \$425                | \$128               | 0.3          | \$400         | \$120        | designation.   |
|                |            |                         |                      |                     |              |               |              | Conference with Maureen and Alex concerning letter about                   |
|                | 7/28/2022  | 0.3                     | \$425                | \$128               | 0.3          | \$400         | \$120        | confidential documents to send to court.                                   |
|                |            |                         |                      |                     |              |               |              | Review and revise letter to court about confidentiality designations and   |
|                | 8/3/2022   | 0.8                     | \$425                | \$340               | 0.8          | \$400         | \$320        | conference with Maureen and Alex about it.                                 |
|                |            |                         |                      |                     |              |               |              | Revise letter to court concerning designation of all documents as          |
|                | 8/10/2022  | 0.5                     | \$425                | \$213               | 0.5          | \$400         | \$200        | confidential.  |
|                | 8/12/2022  | 0.3                     | \$425                | \$128               | 0.3          | \$400         | \$120        | Review and finalize letter to court about confidentiality designastion.    |
|                |            |                         |                      |                     |              |               |              |  |
|                |            |                         |                      |                     |              |               |              | Review cases, documents and correspondence to prepare for                  |
|                | 8/31/2022  | 2.7                     | \$425                | \$1,148             | 2.7          | \$400         | \$1,080      | conference with court concerning bad faith confidentiality designations.   |
|                |            |                         |                      |                     |              |               |              | Review cases and underlying documents to prepare for court                 |
|                |            |                         |                      |                     |              |               |              | conference concerning overbroad confidentiality designation; court         |
|                | 9/1/2022   | 4.2                     | \$425                | \$1,785             | 4.2          | \$400         | \$1,680      | appearance; conference with Alex concerning preparing submissions.         |
|                | 9/8/2022   | 0.6                     | \$425                | \$255               | 0.6          | \$400         | \$240        | Review and revise letter to court.   |
|                |            |                         |                      |                     |              |               |              |  |
|                |            |                         |                      |                     |              |               |              | Conference with Maureen concerning how to respond to discussion            |
|                | 10/25/2022 | 0.3                     | \$425                | \$128               | 0.3          | \$400         | \$120        | with Cole and with Alex concerning making attorneys' fee application.      |
|                |            |                         | TOTAL BILLABLE:      | \$4,930             |              | TOTAL BILLED: | \$4,640      |  |
|                |            | , and the second second | <u>-</u>             |                     | _            |               |              |  |

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|              |            |       |                      |                     | Hours        | Rate          | Total        |   |
|--------------|------------|-------|----------------------|---------------------|--------------|---------------|--------------|---|
| Timekeeper   | Entry Date | Hours | <b>Cusomary Rate</b> | <b>Total Amount</b> | (Discounted) | (Discounted)  | (Discounted) | Work Description  |
| Maureen Bass | 7/11/2022  | 6.7   | \$425                | \$2,848             | 6.7          | \$350         | \$2,345      | Research in camera/ designation issues.   |
|              | 7/12/2022  | 5.9   | \$425                | \$2,508             | 5.9          | \$350         | \$2,065      | Worked on motion to de-designate documents improperly designated as confidetnial. Internal conferences regarding the same.  |
|              | 7/14/2022  | 4.6   | \$425                | \$1,955             | 4.6          | \$350         | \$1.610      | Worked on motion to de-designate improperly designated confidential documents.  |
|              | 8/3/2022   | 1.7   | \$425                | \$723               | 1.7          | \$350         |              | Revised letter to the Court regarding in camera review of exhibits.  Meeting with SS and AF regarding the same.   |
|              | 8/29/2022  | 1.5   | \$425                | \$638               | 1.5          | \$350         | \$525        | Reviewed correspondence to Court regarding confidential designations. Reviewed file to determine appropriate response. Conferences with WW and AF regarding response. Email exchange with SS regarding correspondence.                                      |
|              | 8/29/2022  | 4.6   | \$425                | \$1,955             | 4.6          | \$350         | \$1,610      | Reviewed written opposition to motion to remove designation from documents. Researched availability of "alternative procedure" for the purposes of allowing court to review documents. Internal conferences with AF and WW regarding Defendants' positions. |
|              | 8/30/2022  | 1.5   | \$425                | \$638               | 1.5          | \$350         | \$525        | Reviewed additional correspondence to the court regarding confidential designations. Worked with AF and WW on analysis of claims.   |
|              | 8/31/2022  | 0.9   | \$425                | \$383               | 0.9          | \$350         | \$315        | Internal conferences with AF and SS regarding confidential designations. Worked on preparation for oral arguments. Conferences with WW regarding documents.   |
|              | 9/1/2022   | 1.2   | \$425                | \$510               | 1.2          | \$0           | \$0          | Worked on response to the court regarding confidentiality designations. Conferences with AF regarding the same.   |
|              | 9/2/2022   | 2.2   | \$425                | \$935               | 2.2          | \$425         | \$935        | Conference regarding status conference. Reviewed file in consideration of court's directive.  |
|              | 9/8/2022   | 0.9   | \$425                | \$383               | 0.9          | \$425         | \$383        | Internal conferences regarding responses to confidentiality designation positions.  |
|              | 9/9/2022   | 2.8   | \$425                | \$1,190             | 2.8          | \$425         | \$1,190      | Worked on confidential designation document designation issues including conferences with AF regarding communications with the court.   |
|              | 9/15/2022  | 1.8   | \$425                | \$765               | 1.8          | \$425         | \$765        | Reviewed Cole correspondence. Internal meeting regarding response.  Worked on response.   |
|              | 9/16/2022  | 2.9   |                      | \$1,233             | 2.9          | \$425         | 1 ,          | Reviewed correspondence submitted by Supreme to Court including comparison of charts. Reviewed caselaw regarding newfound positions.  |
|              |            |       | TOTAL BILLABLE:      | \$16,660            |              | TOTAL BILLED: | \$14,095     |   |
|              |            |       |                      |                     |              |               |              |   |

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|                     |            |       |                      |                     | Hours        | Rate           | Total        |  |
|---------------------|------------|-------|----------------------|---------------------|--------------|----------------|--------------|--|
| Timekeeper          | Entry Date | Hours | <b>Cusomary Rate</b> | <b>Total Amount</b> | (Discounted) | (Discounted)   | (Discounted) | Work Description   |
| Alexander Fantauzzo |            |       |                      |                     |              |                |              | Reviewing decision re: motion to seal; meeting with SPS and MTB re:  |
|                     | 6/2/2022   | 0.4   | \$275                | \$110               | 0.4          | \$0            | \$0          | same   |
|                     | 6/3/2022   | 1.4   | \$275                | \$385               | 1.4          | \$275          | \$385        | Drafting correspondence re: confidentiality designations   |
|                     | 6/8/2022   | 0.3   | \$275                | \$83                | 0.3          | \$0            | \$0          | Meet and confer re: confidentiality designations   |
|                     | 6/8/2022   | 1.8   | \$275                | \$495               | 1.8          | \$0            | \$0          | Drafting email confirming meet and confer  |
|                     |            |       |                      |                     |              |                |              |  |
|                     | 6/17/2022  | 0.7   | \$275                | \$193               | 0.7          | \$0            | \$0          | Reviewing emails re: confidentiality designations, Ruotsi subpoena   |
|                     |            |       |                      |                     |              |                |              | Drafting correspondence re: de-designation; reviewing exhibit  |
|                     | 6/20/2022  | 2.3   | \$275                | \$633               | 2.3          | \$275          | \$633        | documents  |
|                     |            |       |                      |                     |              |                |              |  |
|                     | 6/21/2022  | 2.9   | \$275                | \$798               | 2.9          | \$275          | \$798        | Reviewing documents; drafting correspondence re: de-certification  |
|                     |            |       |                      |                     |              |                |              |  |
|                     | 7/8/2022   | 0.6   | \$275                | \$165               | 0.6          | \$0            | \$0          | Meeting with MTB re: in camera submission, potential motion to seal  |
|                     |            |       |                      |                     |              |                |              |  |
|                     | 8/2/2022   | 2.6   | \$275                | \$715               | 2.6          | \$225          | \$585        | Drafting letter to Judge Pedersen re: confidentiality designations   |
|                     |            |       |                      |                     |              |                |              |  |
|                     |            |       |                      |                     |              |                |              | Drafting letter to Judge Pedersen re: confidentiality; meeting with MTB  |
|                     | 8/3/2022   | 2     | \$275                | \$550               | 2            | \$225          | ,            | and SPS re: same; research re: disputes over confidentiality orders  |
|                     | 8/5/2022   | 3.6   | \$275                | \$990               | 3.6          | \$225          | \$810        | Research re: stipulated protective orders, disputes re same  |
|                     |            |       |                      |                     |              |                |              | Drafting correspondence re: confidentiality designations; research re:   |
|                     | 8/8/2022   | 2     | \$275                | \$550               | 2            | \$225          | \$450        | SPOs and disputes re overdesignation   |
|                     |            |       |                      |                     |              |                |              | Revising letter to J. Pedersen re: confidentiality; reviewing  |
|                     | 0 /0 /0 00 |       | 4                    | 4                   | _            | 4              | 4            | correspondence re: de-designations and docs Defs refused to de-  |
|                     | 8/9/2022   | 2     | \$275                | \$550               | 2            | \$225          |              | designate  |
|                     | 8/10/2022  | 1.2   | \$275                | \$330               | 1.2          | \$225          | \$270        | Revising letter re: confidentiality, meeting with SPS re: same   |
|                     | 0/44/2022  | 2     | 6275                 | ć==0                | 2            | ¢225           | 6450         | Revising letter to court, reviewing documents maintained as  |
|                     | 8/11/2022  | 2     | \$275                | \$550               | 2            | \$225<br>\$225 |              |  |
|                     | 8/12/2022  | 1.1   | \$275                | \$303               | 1.1          | \$225          | \$248        | Finalizing letter to J. Pedersen   |
|                     |            |       |                      |                     |              |                |              | Deviancing escalary revenifidantiality designations, notes reventantial  |
|                     | 8/26/2022  | 1.9   | \$275                | \$523               | 1.9          | \$225          | ¢420         | Reviewing caselaw re: confidentiality designations; notes re: potential arguments; meeting with WW re: "confidential" exhibits |
|                     | 0/20/2022  | 1.9   | \$275                | Ş323                | 1.9          | \$225          | 3420         | Reviewing "confidential" exhibits to motion to compel; preparing for   |
|                     | 8/29/2022  | 4     | \$275                | \$1,100             | 1            | \$225          | \$900        | conference; reviewing sur-reply  |
|                     | 8/30/2022  | 4.9   | \$275                | \$1,100             | 4.9          | \$0            |              | Preparing for hearing  |
|                     | 8/30/2022  | 4.5   | \$275                | 71,340              | 4.5          | Ş0             | Ş0           | Freparing for nearing  |
|                     | 8/31/2022  | 4     | \$275                | \$1,100             | 1            | \$225          | \$900        | Preparing for hearing; notes re: confidential exhibits; correspondence   |
|                     | 9/1/2022   | 2.5   | \$275                | \$688               | 2.5          | \$0            |              | Preparing for conference   |
|                     | 9/1/2022   | 1.4   | \$275                | \$385               | 1.4          | \$0            |              | Conference with court re: confidentiality  |
|                     | 9/1/2022   | 0.6   | \$275                | \$165               | 0.6          | \$275          | •            | Meeting with SPS re: submission to Court, next steps   |
|                     | 3/1/2022   | 0.0   | 7213                 | 7103                | 3.0          | 7273           | 7103         | Reviewing confidential designated docs, drafting correspondence to J.  |
|                     | 9/2/2022   | 2.4   | \$275                | \$660               | 2.4          | \$275          | \$660        | Pedersen   |
|                     | 3,2,2022   |       | 7273                 | 7300                | 2.1          | 72,3           | <b>7300</b>  | Drafting letter to J. Pedersen re: Motion exhibits and confidentiality;  |
|                     | 9/6/2022   | 4.9   | \$275                | \$1,348             | 4.9          | \$275          | \$1.348      | meetings with WW re: chart   |
| ļ                   | 3, 3, 2022 | 5     | <i>42,3</i>          | 72,310              | 1.9          | ψ <u>=</u> ,3  | 72,310       |  |

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|            |            |       |                 |              | Hours        | Rate          | Total        |   |
|------------|------------|-------|-----------------|--------------|--------------|---------------|--------------|---|
| Timekeeper | Entry Date | Hours | Cusomary Rate   | Total Amount | (Discounted) | (Discounted)  | (Discounted) | Work Description  |
|            |            |       |                 |              |              |               |              | Drafting letter to J. Pedersen re: exhibits and confidentiality; research |
|            |            |       |                 |              |              |               |              | re: SPO definitions and confidentiality disputes; meetings with WW re:    |
|            | 9/7/2022   | 3.5   | \$275           | \$963        | 3.5          | \$275         | \$963        | exhibits chart  |
|            | 9/8/2022   | 5.2   | \$275           | \$1,430      | 5.2          | \$275         | \$1,430      | Revising letter to J. Pedersen; chart of exhibits                         |
|            | 9/9/2022   | 3.5   | \$275           | \$963        | 3.5          | \$275         | \$963        | Finalizing letter to J. Pedersen; chart, and exhibits                     |
|            |            |       |                 |              |              |               |              | Meeting with SPS and MTB re: Cole letter on PMC docs, drafting            |
|            | 9/15/2022  | 3.4   | \$275           | \$935        | 3.4          | \$0           | \$0          | response  |
|            | 9/16/2022  | 0.8   | \$275           | \$220        | 0.8          | \$0           | \$0          | Reviewing indiv. defs' submission re: confidentiality                     |
|            | 11/1/2022  | 4.7   | \$275           | \$1,293      | 4.7          | \$275         | \$1,293      | Research re: reasonable attys fees; drafting fee application              |
|            | 11/2/2022  | 3.8   | \$275           | \$1,045      | 3.8          | \$275         | \$1,045      | Research re: reasonable atty's fees; drafting MOL                         |
|            | 11/10/2022 | 3.3   | \$275           | \$908        | 3.3          | \$275         | \$908        | Drafting motion for atty's fees; reviewing invoices                       |
|            | 11/11/2022 | 2.4   | \$275           | \$660        | 2.4          | \$0           | \$0          | Reviewing invoices; drafting motion for attys fees                        |
|            | 11/14/2022 | 3.1   | \$275           | \$853        | 3.1          | \$0           | \$0          | Drafting motion for atty's fees, compiling invoices                       |
|            | 11/16/2022 | 2.5   | \$275           | \$688        | 2.5          | \$0           | \$0          | Drafting motion for atty's fees, compiling invoices                       |
|            | 11/17/2022 | 2.5   | \$275           | \$688        | 2.5          | \$0           | \$0          | Drafting motion for attys fees  |
|            | 11/21/2022 | 5.8   | \$275           | \$1,595      | 5.8          | \$275         | \$1,595      | Research re: atty's fees; drafting motion                                 |
|            | 11/30/2022 | 2.7   | \$275           | \$743        | 2.7          | \$275         | \$743        | Drafting memorandum of law re: attys fees                                 |
|            |            |       | TOTAL BILLABLE: | \$27,693     |              | TOTAL BILLED: | \$18,865     |   |
|            |            |       |                 |              |              |               |              |   |

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|                       |            |          |                 |                     | Hours        | Rate          | Total        |   |
|-----------------------|------------|----------|-----------------|---------------------|--------------|---------------|--------------|---|
| Timekeeper            | Entry Date | Hours    | Cusomary Rate   | <b>Total Amount</b> | (Discounted) | (Discounted)  | (Discounted) | Work Description  |
| William Woodard       |            |          |                 |                     |              |               |              |   |
|                       | 8/29/2022  | 5.5      | \$175           | \$963               | 5.5          | \$175         | \$963        | Cumulative time spent reviewing exhibits for upcoming court date        |
|                       |            |          |                 |                     |              |               |              |   |
|                       | 8/30/2022  | 3.5      | \$175           | \$613               | 3.5          | \$0           | \$0          | Cumulative time spent reviewing exhibits for upcoming court date        |
|                       |            |          |                 |                     |              |               |              |   |
|                       | 8/31/2022  | 0.5      | \$175           | \$88                | 0.5          | \$175         | \$88         | Cumulative time spent reviewing exhibits for upcoming court date        |
|                       |            |          |                 |                     |              |               |              | Cumulative time prepared case documents for attorney review and         |
|                       | 9/1/2022   |          | \$175           | \$385               | 2.2          | \$175         |              | spent reviewing exhibits for upcoming court date                        |
|                       | 9/6/2022   | 2.5      | \$175           | \$438               | 2.5          | \$175         | \$438        | Created chart for upcoming submission to court                          |
|                       | 9/7/2022   | 4.5      | \$175           | \$788               | 4.5          | \$0           | \$0          | Created trcking chart for Exhibits to be seen in camera                 |
|                       |            |          |                 |                     |              |               |              |   |
|                       | 9/8/2022   | 1.5      | \$175           | \$263               | 1.5          | \$175         | \$263        | Cumulative time spent on chart adjustment and answering questions       |
|                       |            |          |                 |                     |              |               |              | Cumulative time spent revising chart for submission to court, answering |
|                       |            |          |                 |                     |              |               |              | questions on letter to court, creating exhibits for court, and dropping |
|                       | 9/9/2022   | 2        | \$175           | \$350               | 2            | \$175         | \$350        | off production to court.  |
|                       |            |          | TOTAL BILLABLE: | \$3,885             |              | TOTAL BILLED: | \$2,485      |   |
|                       |            |          |                 |                     |              |               |              |   |
| Courtesy disc         | counts     |          |                 |                     |              |               |              |   |
| January               | 14,761.25  |          |                 |                     |              |               |              |   |
| June                  | 20,000     |          |                 |                     |              |               |              |   |
| July                  | 4,490      |          |                 |                     |              |               |              |   |
|                       |            |          |                 |                     |              |               |              |   |
| GRAND TOTAL BILLABLE: |            | \$53,168 |                 |                     |              |               |              |   |
| GRAND TOTAL BILLED:   |            | \$40,085 |                 |                     |              |               |              |   |